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March 17, 2022

## **BY ECF**

Honorable Katharine H. Parker United States Magistrate Judge Southern District of New York 500 Pearl Street, Suite 1950 New York, New York 10007

Re: City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,

Case No. 19 Civ. 2645 (AJN) (KHP)

Dear Judge Parker:

In accordance with Rules 1.b and 1.c of Your Honor's Individual Practices in Civil Cases, I write on behalf of Moses & Singer LLP ("M&S") to respectfully request an order extending the deadline for the deposition of non-party law firm M&S from March 31, 2022 (Doc. 363) to April 13, 2022. Plaintiffs consent to this request. More specifically, counsel for Plaintiffs and M&S have agreed to conduct the deposition on April 13, 2022.

I requested the extension because M&S has just reopened its physical office, and needs the additional time to properly review and prepare for the deposition on the numerous topics identified in the subpoena. This is the first request for an extension of the deadline to conduct the deposition, and does not interfere with the April 15, 2022 "status report" deadline. Doc. 363.

We wish to thank the Court for its courtesies and consideration.

Respectfully submitted,

MOSES & SINGER LLP

/s John Baranello

By: John Baranello Counsel

Cc: Counsel for all parties, via ECF